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June 14, 2001

The Honorable Joseph J. Farnan, Jr.  
United States District Judge  
824 Market Street  
Wilmington, Delaware 19801

In re: *W.R. Grace, et al.*, Debtors  
Case No. 01-01139(JJF)

Dear Judge Farnan,

The undersigned attorney respectfully requests permission from the Court to make a telephonic appearance in the above-entitled matter. A hearing for a Motion to Modify the Preliminary Injunction is on calendar for June 21, 2001, at 4:00 p.m., EST. I represent Gloria Munoz, the plaintiff in a California employment discrimination case, which is a subject of the Debtors' motion. (*Munoz v. Grace & Gonzales*, a California case filed in Alameda County Superior Court, Case No. 810748-2, mentioned on page 13 in Debtors' Memorandum.) I have filed and served a limited objection to Debtors' motion.

My client's narrowly drawn objection will not impact other parties' interests or other issues raised in Debtors' motion and will only require a few minutes of the Court's time. I only seek to delay, by three months, imposition of the injunction relief on the three individually named defendants in my client's case, who are not under bankruptcy protection, in order to file a discovery motion to obtain the results and reports from a defense psychological examination taken of my client.

Making a personal appearance at said motion would be a logistical and personal hardship, as I am located in California, have a busy litigation calendar, and share childcare commitments with my spouse. I would appreciate the court's indulgence in allowing me to appear by telephone.

Yours very truly,  
HILDEBRAND, MCLEOD & NELSON, INC.

  
ANTHONY S. PETRU

ASP/smc

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CLERK  
U.S. BANKRUPTCY COURT  
DISTRICT OF DELAWARE

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